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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

United States of America,

Plaintiff,

v.

Denzel Renyal Michael Loyd,

Defendant.

Case No. 2:20-cr-00274-APG-MDC

**MOTION TO SEAL
 SENTENCING EXHIBIT**

Denzel Loyd moves to seal Exhibit A to his concurrently filed Sentencing Memorandum. Exhibit A is a psychological evaluation report prepared by Dr. Robert J. Rome.

The First Amendment protects the public's right of access to criminal trials. *See, e.g., Globe Newspaper Co. v. Super. Ct. for Norfolk Cnty.*, 457 U.S. 596, 606 (1982). The public also has a common law right to inspect and copy public records, including those from judicial proceedings. *See Nixon v. Warner Commc'ns*, 435 U.S. 589, 597 (1978). But these rights are not absolute. They must yield when (1) sealing a document serves a compelling interest, (2) that is substantially likely to be harmed if the document is not sealed, and (3) there are no less restrictive alternatives for protecting the interest. *See United States v. Doe*, 870 F.3d 991, 998 (9th Cir. 2017).

Sealing Exhibit A serves the compelling interest of protecting private health records from public disclosure. Notably, the public interest will not be harmed

1 because Loyd's Sentencing Memorandum discusses the pertinent contents of Dr.
2 Rome's report. No public purpose would be served by permitting the public to view
3 further specifics regarding Loyd's disability beyond the details that Loyd is asking
4 the Court to consider and that are discussed in the Memorandum and thus publicly
5 available. For these reasons, the Court should permit Exhibit A to remain under
6 seal.

7 Dated: April 24, 2025

8
9 SNELL & WILMER L.L.P.

10 /s/ Erin Gettel


11 By _____

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16 *Attorney for Denzel Renyal Michael*
17 *Loyd*

18 IT IS SO ORDERED:

19 Dated: April 25, 2025

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21 ANDREW P. GORDON
22 CHIEF UNITED STATES DISTRICT JUDGE
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